

JANET NAPOLITANO
Governor

DONALD BUTLER
Director

Arizona Department of Agriculture

1688 W. Adams Street
Phoenix, AZ 85007
602 542 0997; fax 602 542 5420

March 26, 2008

Docket No. APHIS-2007-0095
Regulatory Analysis and Development, PPD, APHIS
Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

To Whom It May Concern:

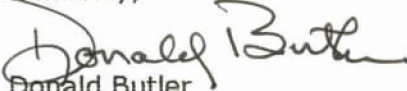
These comments are submitted in reference to Docket No. APHIS-2007-0095.

As Director of the Arizona Department of Agriculture, I support the proposed rule adding San Luis, Arizona, as a port through which cattle that have been infested with or exposed to fever ticks or tick-borne diseases may be imported into the United States. This rule will benefit both U.S. and Mexico cattlemen by reducing costs and enhance the well-being of the animals - without increasing the level of risk to Arizona's or our nation's cattle population.

While the Arizona Department of Agriculture has worked to enhance cattle trade with Sonora, our efforts have always been based on sound science. Our efforts to increase trade have never been at the expense of increasing the risk to our own cattle industry. We have worked directly with Sonora on their animal health programs, including their tick program, since the early 1990's and know firsthand about their efforts to prevent the introduction of ticks from other Mexican states, a strategy that not only reduces the risk to their cattle, but also the risk to Arizona cattle. Sonora's "tick barrier" has been in place on their southern border for decades using the same inspection and dipping protocols as are employed at all U.S. ports of entry. To further reduce the risk to U.S. cattle, cattle that cross at any Arizona port-of-entry are subject to the same inspection and dipping protocol as cattle that cross at other U.S. ports. Thus, there would be no added risk to approving the San Luis port to handle cattle from "ticky" states/areas. This is the same conclusion reached in the risk analysis conducted by the Centers for Epidemiology and Animal Health of the United States Department of Agriculture, Animal and Plant Health Inspection Service, Veterinary Services.

The Arizona Department of Agriculture supports this proposed rule and I urge you to implement it rapidly. This is a rational economic decision, will benefit both countries, is in the best interests of the cattle, and will not increase the level of risk related to cattle fever ticks. Our State Veterinarian will submit additional comments addressing the proposal in detail.

Sincerely,


Donald Butler
Director